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**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

May 3, 2017

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004-1408

**Re: In re Motors Liquidation Company, et al.,  
Case No. 09-50026 (MG); Request to be heard regarding the  
impact of *In re Tronox, Inc.* on the 2016 Threshold Issues**

Dear Judge Glenn:

I represent Celestine Elliott, Lawrence Elliott, Ishmail Sesay, Sharon Bledsoe, Tina Farmer, Paul Fordham, Momoh Kanu, Tynesia Mitchell, Dierra Thomas and James Tibbs, in these proceedings.

New GM and counsel for certain groups of other plaintiffs today requested permission to submit letter briefs on the potential impact of the Second Circuit's decision in *In re Tronox*. Dkt. No. 13914.

My clients also wish to be heard on the issue. Mindful of the Court's preference not to be burdened with duplicative argument, we propose that BrownRudnick and Goodwin Proctor be directed to distribute to me its near-final draft of any letter brief it may be permitted to submit regarding this issue three (3) days prior to filing, in order for me to review it, suggest revisions if appropriate, and to seek leave of the Court to submit additional papers if contentions my clients wish to advance are not advanced by counsel for other parties.

Respectfully submitted,  
/s/ Gary Peller  
Gary Peller

cc: Arthur Steinberg, Esq.  
Howard Steel, Esq.  
William Weintraub, Esq.